

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LORINDA REICHERT,

Plaintiff,

v.

TIME INC., ADMINISTRATIVE COMMITTEE
OF THE TIME WARNER PENSION PLAN, and
FMR LLC,

Defendants.

Case No. 3:11-cv-03592-WHA

**STIPULATION AND [PROPOSED]
ORDER SETTING BRIEFING
SCHEDULE AND ORAL ARGUMENT
ON DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S COMPLAINT
AND INITIAL CASE MANAGEMENT
CONFERENCE (CMC)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their respective counsel of record, pursuant to Local Rules 6-1(b) and 6-2, that Defendants will file a motion to dismiss Plaintiffs' Complaint on September 20, 2011, and subject to the Court's approval, the briefing schedule and hearing date on this matter will be as follows:

- 1) Plaintiff's Opposition to Defendants' Motion to Dismiss will be due on October 14, 2011;
- 2) Defendants' Reply to Plaintiff's Opposition to Defendants' Motion to Dismiss will be due on October 25, 2011;
- 3) The hearing date on this matter will be held on November 17, 2011 at 8 a.m., or as or as soon thereafter as this matter may be heard; and
- 4) The Initial Case Management Conference (CMC) for this matter will be held on November 17, 2011.

Defendants submit the Declaration of Katharine H. Parker in support of this Stipulation and Proposed Order, pursuant to Local Rule 6-2(a).

1 A section for the Court's endorsement is appended below, pursuant to Local Rule 7-12.

2 DATED: September 19, 2011

3 LEWIS, FEINBERG, LEE, RENAKER &
4 JACKSON, P.C.

5 By /s/ Kirsten G. Scott
6 Kirsten G. Scott

7 Attorneys for Plaintiff
8 Lorinda Reichert

9 DATED: September 19, 2011

10 PROSKAUER ROSE LLP

11 By /s/ Katharine H. Parker
12 Katharine H. Parker

13 Attorneys for Defendants
14 Time Inc., Administrative Committee Of The Time
15 Warner Pension Plan, and FMR LLC
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22 **[PROPOSED] ORDER**

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24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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26 Dated: _____

27 Hon. William Alsup
28 United States District Judge

Stipulation And [Proposed] Order Setting Briefing Schedule

No. 3:11-cv-03592-WHA